



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St., Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

March 14, 2011

Mary C. Erickson, Supervisor
Gallatin National Forest
10 East Babcock Street
P.O. Box 130
Bozeman, MT 59771

Re: CEQ 20110042; Bozeman Municipal
Watershed Project Final Supplemental EIS
and ROD

Dear Ms. Erickson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Supplemental Environmental Impact Statement (FSEIS) and Record of Decision (ROD) for the Bozeman Municipal Watershed Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

The FSEIS and ROD indicate that the Gallatin National Forest (NF) has added the following modifications to Alternative 6:

- ▶ Remove Unit 22 C from the project and the accompanying 63 acres of prescribed burning planned for that unit,
- ▶ Increase the no-ignition buffer for burn treatment areas adjacent to Bozeman Creek, Hyalite Creek, and all perennial tributaries from 50 feet to 100 feet, and
- ▶ In coordination with the City of Bozeman, add additional water quality monitoring for turbidity.

The EPA supports efforts being made by the Gallatin National Forest to further reduce potential impacts to water quality from the proposed Bozeman Municipal Watershed Project, and we are pleased that the Gallatin NF is coordinating with the Montana Department of Environmental Quality (DEQ), Water Quality Planning Bureau in making project modifications. The EPA remains supportive of the Bozeman Municipal Watershed Project purpose and need to reduce hazardous fuels and fire risk/severity in the municipal watershed for the City of Bozeman to reduce the risk of excess sediment and ash reaching the municipal water treatment plant, as well as to reduce fire risk/severity to the wildland urban interface (WUI), and increase firefighter and public safety in the event of a wildfire.

As noted in earlier EPA comments in regard to this project, we recognize that land management decisions involve environmental and resource management trade-offs (i.e., trade-offs in impacts among vegetation treatments, fire and fuels, water quality and aquatics, wildlife, and other resource impacts). The Gallatin National Forest appears to have considered the long term trade-offs associated with potentially severe wildfire and high sediment increase risk in comparison to the impacts of implementing the vegetation management activities in this proposal, and the possible short-term increases in sediment to the City of Bozeman water treatment plant.

We are particularly supportive of Gallatin NF decommissioning of approximately 10-15 miles of project roads in the Hyalite drainage as well as stabilize cut slopes along the Hyalite Road #62, and to improve drainage and maintenance of roads in the project area. It is important that the Forest Service assure that adequate funding is provided to carry out road decommissioning and maintenance, since it is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions and increased sediment production and transport from roads. We note that there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis*, March 22, 2007).

Also, it is our understanding that at least one formal review of Best Management Practices (BMPs) will be carried out during project implementation, and that the water quality impacts of proposed fuel reduction activities will be evaluated from water quality monitoring carried out by the City of Bozeman in accordance with their Water Facility Plan. We are also pleased that the Gallatin NF participates and coordinates with EPA and Montana DEQ staff in preparation and implementation of Total Daily Maximum Loads (TMDL's) for both the East Gallatin TMDL (Bozeman Creek) and Lower Gallatin TMDL (Hyalite Creek).

The EPA appreciates the opportunity to review and comment during the NEPA process for this project. If you have any questions regarding our input please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,



Julie A. DalSoglio
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA, 8EPR-N, Denver
Mark Kelley/Robert Ray, MDEQ, Helena
Teri Seth, Gallatin National Forest, Bozeman Ranger District